

## Elk Management in Areas of Brucellosis 2019 Proposed Work Plan

MTFWP & the FWP Commission  
Helena, Montana

Laurel Rod & Gun Club members have always fully supported our neighbors in the domestic livestock business. LRGC members know there are some areas in DSA where our public elk have higher sero-positive rates and we know it may be possible of instances of elk spreading brucellosis to domestic livestock. LRGC completely understands the dire financial consequences of a livestock producer contracting brucellosis, this is not lost to us - we don't live in a vacuum. LRGC, at the end of the day, surely doesn't want our elk infected with brucellosis or other diseases either.

LRGC appreciates the work FWP has done in putting forth this proposed plan, we acknowledge how difficult this discussion and ensuing actions are. LRGC does support our public trust agency and commission. LRGC family members also appreciate the ability to comment on these issues of importance to our members.

LRGC would like to know if (**ALL cattle**) prone to brucellosis and moving into and around Montana are always checked by a competent veterinarian and either ear tagged and/or lip tattooed, not only in the Designated Surveillance Area? Where is this information available, or is it available to the public? We still see ever increasing numbers of long horned cattle and the corriente roping cattle in all areas of Montana. There are actually many corriente cattle in the Laurel/Park City area, many of these are females. Have all of those been checked and certified to be free of brucellosis? Which, if any public agency is charged with the transparent actions regarding these herds? What is the origin of those longhorn & corriente cattle? Texas, Mexico? We feel the real answer isn't always as transparent as the public deserves.

We've now had to accept these elk/brucellosis policies going into year number seven. Up to now there are still several questions from the previous plans beginning with the introductory 2013 plan in Miles City that have yet to be answered. LRGC notices and appreciates that the 2019 proposed plan states on the first page, fourth paragraph that DOL has no authority to prescribe wildlife management actions. LRGC family members will always look at the role played by DOL and our supposedly "public trust bison", DOL plays in actively hazing our public trust bison, they're being managed as livestock - we see that as a management action, one that DOL would relish concerning our elk if guards were let down. DOL should manage only livestock, FWP public trust wildlife, bison are wildlife!

The second page of the proposed work plan talks of local work groups. Although LRGC acknowledges the importance of these groups we see the lack of "sideboards" as a lacking by FWP in this area. Any discussion with any working group must, in our opinion if necessary, a local work group must be introduced and guided with sideboards and have an equal distribution

of the stakeholders. LRGC also sees the FW Commission as having their hands tied and being forced to acquiesce to the work done by a citizens work group suggestion(s), regardless of soundness. Without the benefit of definite sideboards, the discussion and subsequent decisions can very well be flawed in an intended or unintended manner that the Commission feels has to be approved simply because they are citizen work groups.

We still have no documented proof in the brucellosis “hot hits” events that elk are the 100% culprit(s), only they are the probable cause. If our public elk are to blame let’s see conclusive evidence of such, not just emotional or politically motivated anecdotal evidence. LRGC is tired of hearing the all too common “it’s the elk” mantra. This seems to be a case of our elk being guilty and never given the chance to be proven innocent. The domestic livestock from the Mill Creek area have a high hot hit exposure that other areas lack, how come, could it come from undocumented cattle shipments under the radar? Or those domestic livestock just a couple of ridges away from the Flying D? This seems to be a completely inverted system of transparency and subject of (perhaps purposely) mistaken identity, we’ll never know because of the degree of obfuscation.

LRGC knows there have been undocumented and untested movement of cattle, including corriente stock into the Mill Creek area in the past, originating from Texas with high possibilities they came directly from Mexico. The vast majority of the public doesn’t hear this because it’s kept as obscure as possible. There is even a connection from a corriente heifer that aborted not once, but twice, being moved quietly from the Mill Creek area to the Bridger, Montana area and then moved into the Midwest with “rushed through” documentation stating brucellosis free when in fact, the exact opposite was true. Yet, the general public is uninformed by the quiet nature of these activities. We guess it’s just easier to blame elk. Accountability only seems to be applied to the public elk.

A reminder to the Agency and the Commission regarding the small area of the Paradise Valley, namely the Mill Creek area and the area a ridge away from the Flying D ranch that seem to have the brucellosis hot hits. Why is this, are the elk in these areas so much more sero-positive than elsewhere? If they are more prone in that regard, how come? How could these elk (these elk are not associated with the Northern Yellowstone herd) have come to this stage of being highly seropositive?

Could infected cattle or domesticated bison be the cause of the hot hits in these areas? Is the public being duped by special interests and their political interest? In all likelihood our public trust elk have been initially infected by domestic livestock and also the proximity to the disease pits of the Wyoming feedgrounds and now bear the brunt of a political system that assigns blame with impunity.

How is this process even capable of any accountability when these activities are allowed to happen without complete accountability and transparency to the public? Are we forced to accept

this incomplete process? What or who are we protecting, special interests with political ties? LRGCC just wants to protect our public trust wildlife.

LRGC wants to know when are we finally going to have a transparent process that includes the domestic livestock industry, a process where all are held accountable. Let's talk of all movements of domestic livestock and ensure all have undergone the requirements of testing and reporting. When will there be well rounded discussion regarding the elk harboring that happens in many areas of Montana, including many areas in the DSA? LRGCC is very concerned that methods used to put bison under livestock control is happening with our elk, removing one brick at a time out of the public trust wall. Dying by a thousand cuts. The historical memory of what (domestic livestock) initially brought the brucellosis disease to Montana should be on display. The founders warned us of "Tyranny of the Minority".

In closing, LRGCC always will submit a harsh comment on this issue because:

1. We care much about our Public Trust Wildlife, including bison and elk, if we didn't care so much we wouldn't bite as hard as we do.
2. We don't want these brucellosis plans to become so commonplace where we, the sportsmen and women of Montana, are left with our guard down.
3. When we let our guard down, many unwholesome additions to the plan, could be inserted. We would hate to find out about them after the fact.

Respectfully submitted,

Conservation Committee, LRGCC

Herb Stoick, President  
Jason O'Rear, Board Member  
JW Westman, Board Member